

COURTNEY M. GACCIONE, ESSEX COUNTY COUNSEL

By: Alan Ruddy, Esq., Assistant County Counsel

Attorney ID#002411975

Office of the Essex County Counsel

Hall of Records, Room 535, 465 Dr. Martin Luther King, Jr., Blvd., Newark, NJ 07102
(973) 621-5021

(Attorney for Defendant, County of Essex, improperly pled as Department of Citizen
Services Division of Youth Services/Juvenile Detention Center, Essex County Juvenile
Detention Center)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(NEWARK)**

Civil Action No.

Removed from:

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – ESSEX COUNTY
DOCKET NO. ESX-L-762-22

CHRISTIAN ROSARIO,

Plaintiff,

vs.

DEPARTMENT OF CITIZEN
SERVICES, DIVISION OF YOUTH
SERVICES/JUVENILE DETENTION
CENTER, ESSEX COUNTY
JUVENILE DETENTION CENTER,
CITY OF NEWARK, COUNTY OF
ESSEX, STATE OF NEW JERSEY,
JOHN DOES 1-10 (fictitious names),
XYZ CORPS. 1-10 (fictitious names),
INMATES 1-50 (fictitious names)
SECURITY GUARDS 1-50 (fictitious
names) OFFICERS 1-50 (fictitious
names)

Defendants.

Civil Action

NOTICE OF FILING PETITION
TO UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
NEW JERSEY FOR REMOVAL
28 U.S.C. §1446(d)

To: Clerk of the United States District Court
District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut Street
Newark, NJ 07101

On Notice to: Clerk, Essex County Superior Court
Civil Action Division
Veterans Courthouse – Room 131
Newark, NJ 07102

Steve D. Byoun, Esq.
Law Offices of Fusco & Macaluso, P.C.
150 Passaic Avenue
Passaic, New Jersey 07055
(Attorney for Plaintiff)

SIR/MADAM:

PLEASE TAKE NOTICE that the defendants, County of Essex, et al.
on this 14th day of February, 2022 filed a Notice of Removal, a copy of which is attached
hereto, in the United States District Court for the District of New Jersey, to remove the
above-captioned matter from the Superior Court of New Jersey, Essex County, to the
United States District Court for the District Court of New Jersey.

You are also advised that the defendants, upon filing of said Notice of Removal,
filed a copy of the Notice with all counsel of whom defendants have notice has filed
pleadings in this case.

Courtney M. Gaccione
Essex County Counsel
(Attorney for defendant,
County of Essex)

s/Alan Ruddy
Alan Ruddy
Assistant County Counsel

Dated: February 14, 2022

CERTIFICATION OF SERVICE

I hereby certify that the original of the Notice of Petition to the Clerk of the United States District for the District of New Jersey for the Removal and the Notice of Removal were filed with Clerk of the United States District Court for the District of New Jersey, Newark Vicinage, and the Clerk of the Essex County Superior Court of New Jersey, Civil Division, and counsel of record within the time prescribed by the rules of Court.

s/Alan Ruddy
Alan Ruddy
Assistant County Counsel

Dated: February 14, 2022